UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CENGAGE LEARNING, INC., MCGRAW-HILL GLOBAL EDUCATION HOLDINGS, LLC, and PEARSON EDUCATION, INC.,

Plaintiffs,

V.

BOOK DOG BOOKS, LLC d/b/a TEXTBOOKRUSH and TEXTBOOKSRUS, APEX MEDIA, LLC, AND ROBERT WILLIAM MANAGEMENT, LLC,

Defendants.

Case No. 1:16-cv-7123 (WHP)(GWG)

NOTICE OF MOTION

Please take notice that Plaintiffs Cengage Learning, Inc., McGraw-Hill Global Education Holdings, LLC and Pearson Education, Inc. ("Plaintiffs"), upon the accompanying Memorandum of Law, will move this Court before the Honorable William H. Pauley III, United States District Judge at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, NY on a date to be determined by the Court, for an order *in limine* precluding Ronald G. Quintero from offering certain testimony at trial.

Dated: November 20, 2017

OPPENHEIM + ZEBRAK, LLP

By: /s/ Matthew J. Oppenheim

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